# UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

FILED

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CRIMINAL NO: CLERK, U.S. DISTRICT CLERK WESTERN DISTRICT OF TEXA
CRIMINAL NO: WESTERN DISTRICT OF TEXA  SA: 17-MJ-1477-ESC BY  INFORMATION  DEPUT
) Count One – Title 18 U.S.C.
Section 641 – Theft of Government
) Property
Count Two – Title 18 U.S.C. Section 13
(Involving Section 545.401, T.T.C.) –
) Reckless Driving
Count Three – Title 18 U.S.C. Section 13
(Involving Section 545.421, T.T.C.) –
) Fleeing or Attempting to Elude Police
) Officer

### THE UNITED STATES ATTORNEY CHARGES:

<u>COUNT ONE</u> [18 U.S.C. §641]

On or about 26 October 2017, at Joint Base San Antonio-Fort Sam Houston, Texas, in the Western District of Texas and within the special maritime and territorial jurisdiction of the United States, the Defendant,

### RONNELLE L. COLLINS,

did willfully and knowingly steal one IMAC Computer, of a total value of more than \$1,000.00, of the goods and property of the United States, in violation of Title 18 United States Code, Section 641; and one Nessie USB Microphone, of a total value of less than \$1,000.00, of the goods and property of the United States, in violation of Title 18 United States Code, Section 641.

### <u>COUNT TWO</u> [18 U.S.C. §13 (Involving §545.401 T.T.C.]

On or about 26 October 2017, at Joint Base San Antonio-Fort Sam Houston, Texas, in the Western District of Texas and within the special maritime and territorial jurisdiction of the United States, the Defendant,

#### RONNELLE L. COLLINS,

did willfully and knowingly drive a vehicle in a public place in wilful or wanton disregard for the safety of person or property, in violation of Title 18 United States Code, Section 13 (involving Section 545.401, Texas Transportation Code).

## <u>COUNT THREE</u> [18 U.S.C. §13 (Involving §545.421 T.T.C.]

On or about 26 October 2017, at Joint Base San Antonio-Fort Sam Houston, Texas, in the Western District of Texas and within the special maritime and territorial jurisdiction of the United States, the Defendant,

### RONNELLE L. COLLINS,

did operate a motor vehicle and wilfully fail to bring the vehicle to a stop, flee, or attempt to elude, a pursuing police vehicle when given a visual or audible signal to bring the vehicle to a stop, in violation of Title 18 United States Code, Section 13 (involving Section 545.421, Texas Transportation Code).

Respectfully submitted,

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